

LPRSA Feasibility Study for Upper 9-Mile Interim Remedy
Proposed Memoranda Outline
April 2, 2018

Memo #1 – 15 Days following EPA’s Direction Letter Directing an Interim Remedy

1. Technology screening
 - a. EPA comments and CPG RTC on Technology screening
 - b. Summary of revision approach
2. Engineering assumptions
 - a. Table summarizing assumptions
 - b. Supporting information, including calculations, references, and benchmarking
3. Modeling approach
 - a. Table summarizing modeling approach
 - b. Summary of supporting evaluations to develop approach

Memo #2 – 30 Days following (1) receipt of EPA Direction Letter and (2) CSTAG/R2 feedback and subsequent discussions

1. RAOs – final text of RAOs
2. Remedial alternatives
 - a. Summary of final remedial alternatives
 - i. Maps showing active remedial areas
 - ii. Remedial acres and volumes
 - b. Sequencing

Memo #3 – 60 Days following receipt of (1) receipt of EPA Direction Letter and (2) CSTAG/R2 feedback and subsequent discussions

1. FS Evaluations – summary of approach (to address EPA comments on 2015 CPG FS memos)
 - a. FS short- and long-term evaluation metrics
 - i. Table of metrics and approach to calculations will be provided for discussion
 - ii. Table and approach will be finalized for EPA review following discussion
 - b. Principal Threat Waste evaluation
 - i. Approach provided for discussion
 - ii. Final approach, maps, and calculations for EPA review following discussion
 - c. ARARS
 - i. ARAR waiver for surface water quality standards (consideration of supporting analyses in FS)
 1. Approach provided for discussion
 2. Final approach and calculations for EPA review following discussion
 - d. Navigation Channel deauthorization
 - i. FS text for discussion and review

2. Adaptive management – Summary of approach – figures, tables, and text for discussion and review
 - a. Adaptive management framework
 - b. Monitoring framework
 - c. Adaptive management triggers and actions